



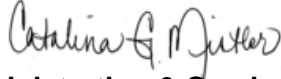
OPERATIONS MEMO

Update of the California Student Aid Commission

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TO: Financial Aid Administrators
High School Counselors

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SUBJECT: Secure Data Transfer Capability Available via WebGrants

The California Student Aid Commission (Commission) is pleased to announce that in our continuing efforts to improve information security for our student records, the Commission has implemented a secure file transfer capability within WebGrants.

The benefits to this new capability are:

- Institutions and the Commission can transfer sensitive data back and forth to each other via a web browser tool without having to encrypt files and attachments before sending them by e-mail or snail mail;
- Avoid the risk and possible breach notification costs (financial and reputation) inherent with sending media via mail/shipping and having it be lost or stolen;
- No need to purchase new software or train staff on additional steps for encrypting data and communicating passwords to each other;
- Secure repository for the communicated information.

The Commission has updated its training documentation to show how to use this new capability. This documentation can be found on the Help screen within WebGrants, under the section titled "Security". The two training documents are as follows:

- [IPA Information Security Training](#) - Used for annual Information Security training
- [Secure Data Transfer](#) - Contains info on how to transfer data securely

The access to this new capability is located on the WebGrants Data Transfer screen, with a choice of File Upload or Report Download and selecting Secure



State of California
Arnold Schwarzenegger
Governor

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File Transfer. Once a file is uploaded, it is available for use by the institution or the Commission and is not seen by other institutions. If the recipient is unaware that the file is being transferred, let them know it is available and they can access or delete the file.

If you have any questions, consult the training and documentation first, and then contact School Support if you have any additional concerns.

Why is the Commission implementing this feature?

The Commission and postsecondary institutions qualify as financial institutions under the 2003 revision to the federal Gramm-Leach-Bliley Act.

Federal and state laws and regulations require that for financial institutions, all confidential information must be handled, stored, transferred and ultimately destroyed in a secure manner – regardless of the media (paper/electronic/CDROM, etc) or medium (internet, mail, fax).

For the Commission and educational institutions, transferring student data securely between one another has been difficult with differing encryption standards, staff training requirements, password management, the possible loss of mail or packages sent with sensitive data enclosed, and finding an option to offset the convenience of plain-text e-mail or attachments as opposed to secure transfer requirements.

Over the last few years, the Commission has implemented additional steps to comply with these regulatory requirements, as well as assist schools in keeping student data safe. These include:

- The Institutional Participation Agreement now includes Section 6, relating to Information Security;
- At the request of colleges, the Commission has provided training for Information Security;
- Changes to confidentiality forms to remove references to sensitive personal information of educational institution employees; and
- Other behind-the-scenes improvements that continue to be implemented.

What is changing in day-to-day interactions with the Commission?

The Commission is asking all financial aid offices to begin using this new feature immediately to transfer confidential data between themselves and the Commission, instead of e-mailing or faxing the data electronically, or sending CDROM's or paper records which have been used in the past to transport confidential information.

If a WebGrants account is not available, continue to encrypt any confidential information before sending it to the Commission

Requirements by the Commission's compliance team for paper records will continue to be honored in the manner as currently processed, and any changes to their procedures will be communicated in a future Operations Memo.

If you have any questions regarding this Operations Memo, please contact School Support Services at (888) 294-0153 or by e-mail to schoolsupport@csac.ca.gov.